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DOCKET FILE COPY ORIGINAL

May 30, 1997

RECEIVED

MAY 30 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

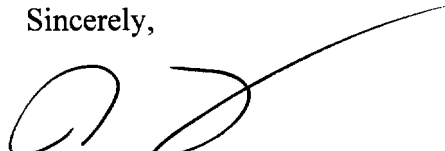
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Caton:

Enclosed, on behalf of Tennessee Valley Radio, Inc., are an original and four copies of its Petition for Rule Making.

Should there be any questions in connection with this transmittal, please do not hesitate to contact the undersigned or M. Scott Johnson at (202) 408-7122.

Sincerely,



Jocelyn R. Roy

Enclosure

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**FEDERAL COMMUNICATIONS COMMISSION**  
**OFFICE OF SECRETARY**

**MM Docket No. \_\_\_\_\_**  
**RM-\_\_\_\_\_**

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**To: Chief, Mass Media Bureau**

## 1

Tennessee Valley Radio, Inc. (“TVRI”), licensee of radio station WPZM (FM),  
Tullahoma, Tennessee, by its attorneys and pursuant to Section 1.420 (i) of the Rules and  
Regulations of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R.  
§ 1.420 (i), hereby respectfully requests the Commission to amend Section 73.202 (b) of its  
Rules, 47 C.F.R. § 73.202 (b), to: (a) delete Channel 227C1 from Tullahoma, Tennessee and add  
Channel 227C1 to Madison, Alabama and; (b) modify the license for WPZM (FM) to specify  
Madison, Alabama as the station’s community of license. In addition, although no technical  
changes are proposed, to the extent it may be appropriate or necessary, TVRI hereby requests a  
waiver of Section 73.207 of the Commission’s Rules, 47 C.F.R. § 73.207 requiring minimum  
distance separations. In support whereof, the following is shown:

## ***REALLOTMENT AND MODIFICATION***

1. TVRI is the licensee of radio station WPZM (FM), Tullahoma, Tennessee. WPZM is licensed to operate on Channel 227C1. Pursuant to Section 1.420 (i) of the Rules, TVRI seeks to modify its license to specify Madison, Alabama as its community of license. Section 1.420 (i) authorizes the Commission to make such a modification where the amended allotment would be mutually exclusive with the licensee's present allotment.

2. Two factors must be demonstrated in order to change a station's community of license: (1) the channel changes must be mutually exclusive; and (2) the modification must not deprive a community of its only local transmission service. *See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *clarified* 5 FCC Rcd Rcd 7094 (1990). TVRI's proposal is consistent with these factors.

3. As the Engineering Report prepared by Mullaney Engineering, Inc., attached hereto, reflects WPZM proposes to continue to operate on existing Channel 227C1 and the proposal is mutually exclusive with WPZM's currently licensed facility. Presently there are two radio stations licensed to Tullahoma and one radio station licensed to Madison. Tullahoma stations include Station WPZM (FM) and Station WJIG (AM) *See* Engineering Report. Madison is licensed an AM Station WUMP(AM). Moreover, as demonstrated *infra*, Class A FM Channel 296 is available for allotment to Tullahoma.

4. Madison is clearly in need of its first local FM facility. Madison had a 1990 population of 14,904. Since 1990, the population of Madison has grown rapidly. U.S. Department of Commerce estimates a growth of 27% from 1990 to a 1994 population of 20,241.

Consistent with this level of growth, the City of Madison Industrial Development Board states the 1995 population of Madison to be approximately 22,000, showing continuing rapid growth.<sup>1/</sup> The City expects the population to reach 28,708 by the year 2000. Source: City of Madison, Community Development Department; Equifax National Decision Systems.<sup>2/</sup>

5. Madison is an incorporated city with its own full-time mayor and a five-member city council. Madison has its own police and fire departments and its own water and sewage services. Madison has two weekly newspapers, The Madison Globe and the Madison County Record.

6. In addition, Madison has its own school system, with three elementary schools, two middle schools, and one high school. Source: Madison County Board of Education. Madison has a number of its own commercial establishments which would be expected for a city of roughly 20,000. In addition, the following are major employers in Madison (all of which are located within the Madison city limits): Century Fasteners; Cox Corporation; Bruno Incorporated; Excellance; Halsey Grocery; Intergraph; Label Aid; Kroger; Madison Books and Computers; Rapair; Sea Wire & Cable; Sherman International; and Texport. Source: City of Madison Revenue Department. Retail sales in Madison totaled \$157,562,650 in 1995. Source: City of Madison Revenue Department; Equifax National Decision Systems.

7. In changing its city of license, WPZM proposes neither a gain nor loss in service. No modification to the WPZM facilities is necessary to effect the change in community of

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<sup>1/</sup> In comparison, the U. S. Census data for Tullahoma shows a gain of only 984 individuals from a 1990 population of 16,761 to 1994 estimate of population of 17,745, a gain of 5%. Population Distribution and Population Estimates Branches, U.S. Bureau of Census, Press Release CB95-179, 10-2-95.

<sup>2/</sup> From 1980 to 1990, Madison grew by 267.4%. Thus, Madison has a history of growth which is continuing.

license. Moreover, TVRI's proposal will not deprive Tullahoma of its only local transmission service and the Tullahoma area has a plethora of radio service. Lastly, as the Technical Exhibit notes, a new Class A FM channel can be allotted to Tullahoma to provide added local FM service, as has been proposed in MM Docket No. 96-123 (RM 8875).

8. The attached Engineering Report demonstrates that the reallocation of WPZM to Madison will not alter the station's coverage of the Huntsville Urbanized Area. Recently, the Commission considered the case of a station proposing to change its community of license to a community located close to an Urbanized Area. *Georgetown and Garden City, South Carolina, Notice of Proposed Rule Making*, MM Docket No. 96-196, RM-8878 (released September 20, 1996). The station in question was already providing a 70 dBu signal over the entire Urbanized Area in question. The Commission held, therefore, that the station was not "moving into" the Urbanized Area, and that the applicant was not required to submit the usually required analysis of whether the proposed community is independent from the larger metropolitan city.<sup>3/</sup>

9. TVRI's proposal is consistent with this precedent. WPZM presently provides a 70 dBu signal over the entire Huntsville Urbanized Area. Under TVRI's proposal, WPZM will continue to provide the entire Huntsville Urbanized Area with a 70 dBu signal. Accordingly, TVRI is not proposing to move WPZM's signal into the Huntsville Urbanized Area, and its proposal can be granted under *Georgetown and Garden City, South Carolina* without having to submit a *Tuck* analysis.

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<sup>3/</sup> When evaluating the independence of a community, the Commission looks to the following factors: (1) population coverage to the proposed suburban community and to the Urbanized Area; (2) size of the suburban community versus size of the Urbanized Area; and (3) the interdependence of the suburban community and the Urbanized Area. See *Faye & Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*").

10. As stated above, Madison has its own sizable population of over 20,000, which is separate from Huntsville's population of 159,789 and has its own independent attributes (*see* ¶¶ 4, 5, 6, *supra*.) Madison is not included in the Huntsville Urbanized Area, a determination which is made by the U.S. Census Bureau based upon population groupings. Accordingly, even if an analysis under *Tuck* were required, it is clear that Madison is a separate, independent community, and not interdependent on Huntsville.

11. In addition, the attached Engineering Report prepared by Mullaney Engineering, Inc. at Exhibit EE demonstrates that the city of Madison is located 31.1 miles from the current transmitter site of WPZM. Using calculations which utilize actual terrain averages it is readily apparent that the predicted 70 dBu contour extends by approximately 1.5 miles the city grade coverage area and, accordingly, WPZM provides a 70 dBu signal over the entire city of Madison. The Mullaney engineering calculations are consistent with the policies set forth in *Woodstock and Broadway, Virginia*, 3 FCC Rcd 6398 (1988).

12. Approval of TVRI's proposal is consistent with the Commission's criteria for assignment of FM channels. The FM priorities are: (1) first aural service; (2) second aural service; (3) first local service; and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). *See Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 (1982). In proceedings to change the community of license of an FM station, the Commission considers the availability of both FM and AM services in the relevant communities. *See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 5 FCC Rcd 7094, 7097 (1990). As noted above, both Tullahoma and Madison already have local service. Accordingly, the Commission must consider

other public interest factors to determine which community would be better-served by the FM allotment.

13. The Commission's comparison of public interest matters can take into account such factors as the relative size of the proposed communities and their growth rates. *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92, fn. 8 (1982). As explained in paragraph 4 *supra*, Madison experienced a population surge of 27% from 1990 to 1994; in contrast, the population of Tullahoma grew by only 5% during the same time period. Madison is now a significantly larger community than Tullahoma, and it appears that the growth of Madison will continue. Accordingly, the public interest would be well-served by providing Madison with its first local FM service.<sup>4/</sup>

14. If the Commission grants the petition for allotment of Channel 227C1 to Madison, TVRI will promptly file an application for minor change and, if granted, will construct and operate WPZM at Madison with the facilities reflected in the Engineering Report attached hereto as Exhibit EE.

#### ***REQUEST FOR WAIVER OF SECTION 73.207***

15. Section 73.207 of the Commission's rules sets forth the minimum distance separation requirements for FM allotments. As is apparent from the attached Engineering Exhibit, WPZM's facility as currently licensed has a 4 km short-spacing involving Station WGMZ at Channel 226A at Glencoe, Alabama. However, the short-spacing is a direct result of a change in site requested by WGMZ under Section 73.215 of the Commission's rules. Accordingly, according to Commission interpretation, WGMZ is short-spaced; however, WPZM

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<sup>4/</sup> Moreover, as noted in paragraph 7 *supra* and in the attached Engineering Exhibit, a new FM channel has been proposed for allotment to Tullahoma.

is not - - unless WPZM proposed to move its site closer to WGMZ. TVRI does not propose to move the WPZM transmitter site from its currently licensed location or to create new short-spacing, rather TVRI only seeks a reallocation to specify a new city of license. Nevertheless, to the extent the Commission must consider the minimum distance separation requirements when making a reallocation involving solely a change in city of license, a waiver of Section 73.207 is requested.

16. Grant of a waiver of Section 73.207 of the Commission's Rules is in the public interest. The Commission has held that waivers of the strict application of Section 73.207 may be granted:

provided that no new short spacings are created, no existing short spacings are exacerbated, and the potential for interference between the currently short-spaced stations is not increased.<sup>5/</sup>

TVRI meets all of the criteria for waiver. TVRI does not propose to change the WPZM transmitter location or any aspect of its technical operation; therefore, it will not be "creating" any new short spacings, nor will it exacerbate existing short spacings or increase the potential for interference among existing short-spaced stations. Accordingly, waiver of Section 73.207 is appropriate.

17. Finally, as the attached Engineering Report reflects, no area which is properly spaced to all required stations is available. Any move designed to eliminate the existing short-spacing will create new short-spacing.

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<sup>5/</sup> *In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations, (Newnan and Peachtree City, Georgia), MM Docket No. 90-138. RM 7040, 7 FCC Rcd. 6307 (1992).*




For the reasons set forth above, the public interest would be served by the foregoing proposal and, accordingly, the Commission is respectfully requested to: (a) issue a notice of proposed rule making to reallocate Channel 227C1 from Tullahoma, TN, to Madison, AL; and (b) issue appropriate show cause orders to modify the license of station WPZM (FM) and, if necessary, grant TVRI's requested waiver of Section 73.207 of the Commission's Rules.

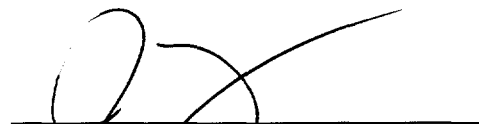
Respectfully submitted,

**TENNESSEE VALLEY  
RADIO, INC.**

By:

  
M. Scott Johnson, Esquire

By:

  
Jocelyn R. Roy, Esquire

Its Attorneys

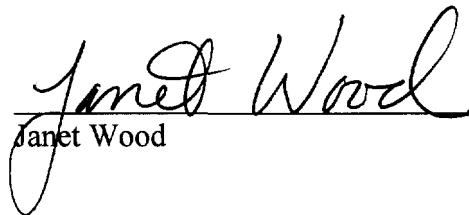
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900  
East Tower  
Washington, DC 20005  
(202) 408-7100

Date: May 30, 1997

CERTIFICATE OF SERVICE

I, Janet Wood, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 30th day of May, 1997, caused to be sent by first-class U.S. mail, postage-prepaid, a copy of the foregoing Petition for Rule Making to the following:

John Karousos  
Chief, Allocations Branch  
Mass Media Bureau  
Federal Communications Commission  
2000 M Street, N.W.  
Room 554  
Washington, D.C. 20554

  
\_\_\_\_\_  
Janet Wood

JOHN J. MULLANEY  
JOHN H. MULLANEY, P.E. (1994)  
ALAN E. GEARING, P.E.

301 921-0115 Voice  
301 590-9757 Fax  
mullengr@aol.com E-mail

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**ENGINEERING EXHIBIT EE:**

**TENNESSEE VALLEY RADIO, INC.  
RADIO STATION WPZM (FM)  
PROPOSED CHANGE OF CITY OF LICENSE  
EXISTING CH. 227C1 - TULLAHOMA, TN  
PROPOSED CH. 227C1 - MADISON, AL**

**MAY 28, 1997**

**ENGINEERING STATEMENT IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ASSIGNMENTS**

**ORIGINAL  
SIGNATURE**

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT EE:**

**TENNESSEE VALLEY RADIO, INC.  
RADIO STATION WPZM (FM)  
PROPOSED CHANGE OF CITY OF LICENSE  
EXISTING CH. 227C1 - TULLAHOMA, TN  
PROPOSED CH. 227C1 - MADISON, AL**

**TABLE OF CONTENTS:**

1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, WPZM - Licensed FM Coverage.
4. Figure 2, Map Illustrating City Grade Coverage to Madison, AL.
5. Figure 3, Channel Allocation Study for Ch. 227C1.  
from the Existing Licensed Site.

**MULLANEY ENGINEERING, INC.**

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Tennessee Valley Radio, Inc., licensee of Radio Station WPZM (FM) in Tullahoma, Tennessee, to prepare an engineering statement in support of a Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
John J. Mullaney

Executed on the 28th day of May 1997.

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT EE:**

**TENNESSEE VALLEY RADIO, INC.  
RADIO STATION WPZM (FM)  
PROPOSED CHANGE OF CITY OF LICENSE  
EXISTING CH. 227C1 - TULLAHOMA, TN  
PROPOSED CH. 227C1 - MADISON, AL**

**NARRATIVE STATEMENT:**

**I. GENERAL:**

This engineering statement has been prepared on behalf of Tennessee Valley Radio, Inc., which presently operates FM Station WPZM (FM) on Ch. 227C1 at Tullahoma, Tennessee. The purpose of this statement is to support a request that the FM Table of Assignments be amended to delete Ch. 227C1 at Tullahoma, Tennessee and to re-allot Ch. 227C1 to Madison, Alabama and to modify WPZM's license accordingly.

It should be noted that the area in question is not within 290 kilometers (180 miles) of a U.S. Border and, therefore, foreign concurrence is not required.

**II. ENGINEERING DISCUSSION:**

**A. Transmit Site:**

WPZM (FM) proposes to remain at its existing site which is located at the following geographic coordinates:

Latitude: 35° 02' 04"  
Longitude: 86° 22' 52"

**Radio Station WPZM (FM)  
Change of City of License**

**MULLANEY ENGINEERING, INC.**

WPZM currently operates from the top of a 334 meter (1095') tower with an ERP of 100 kW at 299 meters (981 feet). WPZM is licensed as a maximum Class C1 facility.

The existing site has no major terrain obstructions between it and its requested city of license, Madison, AL.

**B. City of License:**

The city of Madison, Alabama, is located in Madison County at the following geographic coordinates:

Latitude: 34° 41' 57"  
Longitude: 86° 44' 54"

The city reference coordinates are located some 50.1 km (31.1 miles) on a bearing of N-222-E of WPZM's licensed site.

**C. City Grade Service:**

For allotment purposes, the FCC generally uses a "perfect circle" to determine if the requested city of license is located close enough to the proposed reference point to receive a city grade 70 dBu signal as predicted by the F(50,50) curves. For a Class C1 facility the radius of this "perfect circle" is 50 km (31 miles).

Consequently, inasmuch as the city of Madison is located 50.1 km from WPZM's licensed site it would appear, at first blush, that a portion of the city limits was just beyond the 70 dBu contour. However, in the case of an upgrade by an existing station at Woodstock, VA, the FCC established a policy which permits an existing facility involved in a rule

**Radio Station WPZM (FM)  
Change of City of License**

**MULLANEY ENGINEERING, INC.**

making to use the actual 3 to 16 kilometer terrain averages to determine a more accurate distance to the 70 dBu city grade contour (3 FCC Rcd 6398 (1988)). Since WPZM is not requesting a change of site or a change in its channel/class combination and is in fact requesting only a change in its city of license the policy set forth in the Woodstock proceeding is applicable here. Using the criteria dictated in Woodstock, all of Madison is contained within the 70 dBu contour.

Figure 1 is a tabulation of the HAATs and resulting 70 & 60 dBu coverage for WPZM's licensed facilities. As can be seen, the terrain on the N-222-E radial is 38.4 meters (126 feet) lower than the average terrain surrounding the site. This results in the HAAT on the N-222-E radial being 38 meters higher than WPZM's licensed HAAT of 299 meters. This additional height extends the distance to the 70 dBu city by 2.5 km (1.5 mi) or to a distance of 52.5 km (32.6 mi).

Figure 2 is a color copy of a USGS 1:250,000 map showing the community of Madison, Alabama. As can be see, the entire city of Madison is enclosed within the 70 dBu contour as determined by actual terrain averages. The contour is based upon 360 evenly spaced terrain radials.

**D. Other Services:**

The Community of Tullahoma currently has the following stations licensed or pending:

1. WJIG (AM) operates on 740 kHz with 0.25 kW during daytime hours.
2. WPZM (FM) operates on Ch. 227C1 with an ERP of 100 kW at an HAAT of 299 meters.



**Radio Station WPZM (FM)  
Change of City of License**

**MULLANEY ENGINEERING, INC.**

3. American Family Station has a pending application to operate on FM Ch. 203A with 1.9 kW at 54 meters.
4. MM Docket 96-123 is considering the allotment of Ch. 296A (RM8875).

The Community of Madison currently has the following station licensed:

1. WUMP (AM) operates on 730 kHz with 1.0 kW during daytime hours.

**E. Channel Allocation Study:**

Figure 3 is a Channel Allocation Study from WPZM's existing licensed site which indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings. From this study it can be determined that WPZM's site exceeds all but one of the minimum separations. It should be noted that the 4 km (2.4 mi) short spacings involving WGMZ on Ch. 226A at Glencoe, AL, was the direct result of a change of site application filed by WGMZ under Section 73.215 - contour protection. The interpretation of the FM Branch to such a short spacing situation is that WGMZ is definitely short spaced but WPZM is not short spaced to WGMZ unless WPZM proposes a new site located at a closer distance to WGMZ. The 4 km short spacing caused by WGMZ is such that no area exists which is properly spaced to all required stations. A site which is properly spaced to WGMZ would end up being short spaced to either WSYE on Ch. 227C at Forest City, NC or to WDNS(CP) on Ch. 227C3 at Bowling Green, KY.

Radio Station WPZM (FM)  
Change of City of License

MULLANEY ENGINEERING, INC.

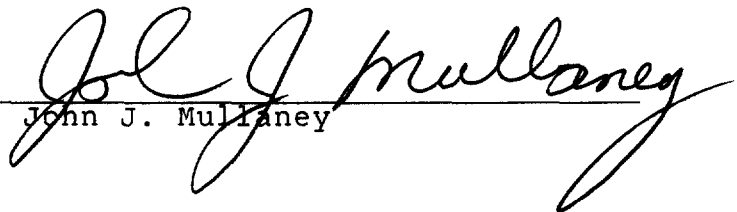
III. SUMMARY:

Tennessee Valley Radio, Inc., Licensee of Radio Station WPZM (FM) requests that the FM Table of Assignments be amended to delete Ch. 227C1 at Tullahoma, Tennessee and to re-allot Ch. 227C1 to Madison, Alabama and to modify WPZM's license accordingly.

City	Present	Proposed
Tullahoma, TN	App 203A, 227C1 Add 296A	App 203A, Add 296A
Madison, AL	- - -	227C1

WPZM (FM) believes that the proposed allotment of the First Full Time Service assigned to Madison, Alabama, will Serve the Public Interest.

May 28, 1997.

  
John J. Mullaney

**FM COVERAGE**  
\*\*\*\*\*

**WPZM LIC - Tullahoma, TN**

**5/97**

**CHANNEL NO. 227 C1      FREQUENCY 93.3 MHZ**

**CENTER OF RADIATION 588.9 METERS AMSL**

**COORDINATES: 35-02-04 / 86-22-52**

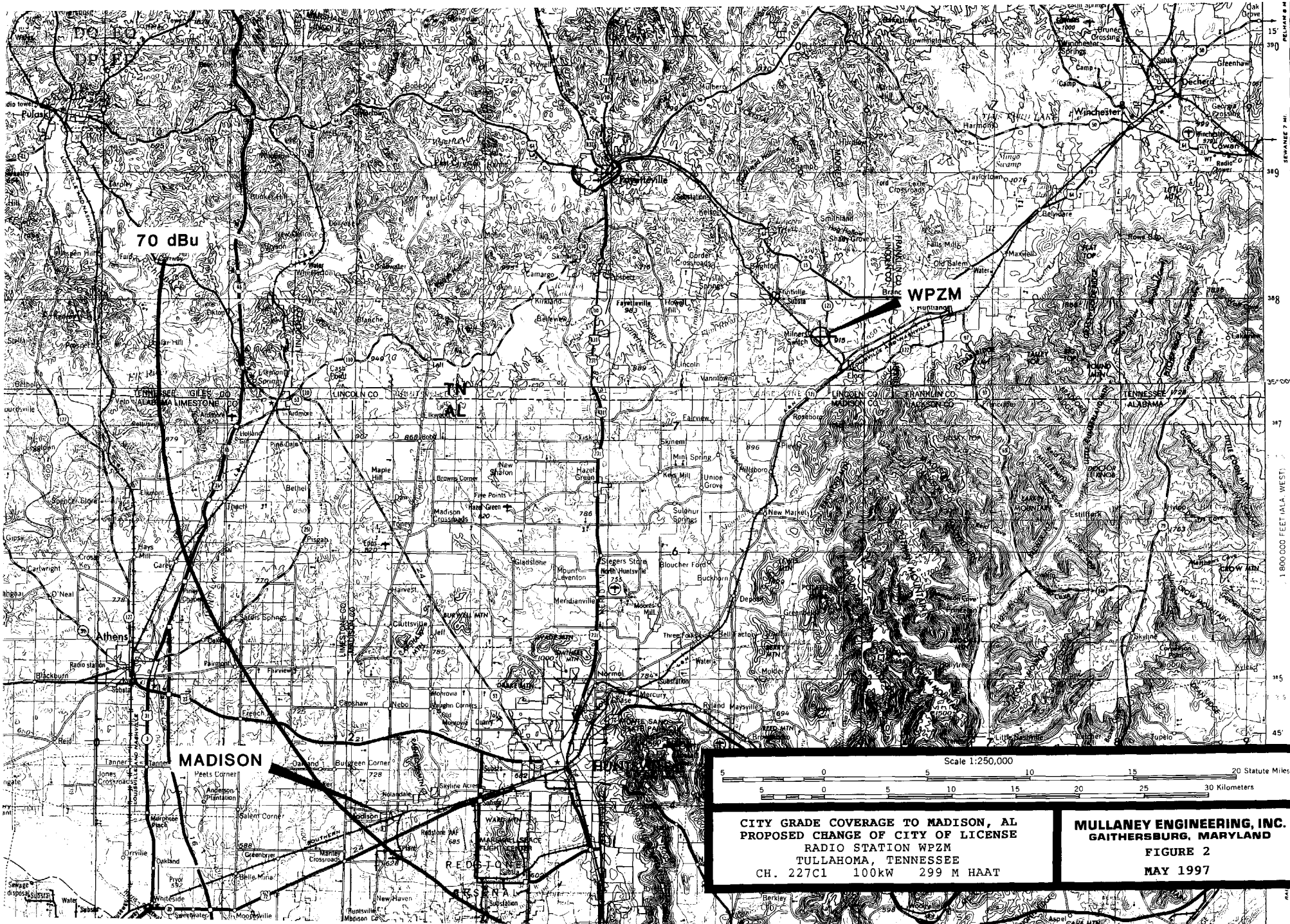
		BEARING	3-16 KM	C.R.	E.R.P.	DISTANCE TO	
		DEGREES	AVERAGE	HAAT	(KW)	CONTOURS (KM)	
		*****	*****	*****	*****	70.0	60.0
		*****					
Tullahoma	0.	*	254.4	334.5	100.	52.3	75.0
	15.		270.0	318.9	100.	51.3	73.9
	25.		259.9	329.0	100.	52.0	74.5
	30.		269.6	319.3	100.	51.3	73.9
	45.	*	272.2	316.7	100.	51.2	73.7
	60.		274.4	314.5	100.	51.0	73.4
	75.		278.9	310.0	100.	50.7	73.1
	90.	*	295.6	293.3	100.	49.6	71.8
	105.		324.8	264.1	100.	47.6	69.4
	120.		335.9	253.0	100.	46.8	68.6
	135.	*	412.4	176.5	100.	41.2	61.6
	150.		383.2	205.7	100.	43.5	64.4
	165.		340.4	248.5	100.	46.5	68.1
	180.	*	304.5	284.4	100.	49.1	71.1
	195.		258.7	330.2	100.	52.1	74.7
Madison	210.		252.7	336.2	100.	52.5	75.0
	220.		252.8	336.1	100.	52.5	75.0
	222.		252.1	336.8	100.	52.5	75.2
	225.	*	252.1	336.8	100.	52.5	75.2
	240.		260.4	328.5	100.	52.0	74.5
	255.		257.5	331.4	100.	52.1	74.7
	270.	*	264.9	324.0	100.	51.7	74.2
	285.		273.8	315.1	100.	51.0	73.5
	300.		267.7	321.2	100.	51.5	74.0
	315.	*	267.8	321.1	100.	51.5	74.0
	330.		261.9	327.0	100.	51.8	74.3
	345.		267.1	321.8	100.	51.5	74.0

**AVERAGE ( 8) \*    290.5    298.4 Meters**

**AREA IN SQUARE KILOMETERS                      7850. 16375.**

**LICENSED FM COVERAGE - F(50,50)  
PROPOSED CHANGE OF CITY OF LICENSE  
RADIO STATION WPZM  
TULLAHOMA, TENNESSEE  
CH. 227C1    100kW    299 M HAAT**

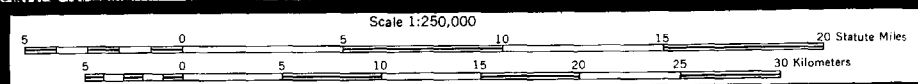
**MULLANEY ENGINEERING, INC.  
GAITHERSBURG, MARYLAND  
FIGURE 1  
MAY 1997**



70 dBu

WPZM

MADISON



CITY GRADE COVERAGE TO MADISON, AL  
PROPOSED CHANGE OF CITY OF LICENSE  
RADIO STATION WPZM  
TULLAHOMA, TENNESSEE  
CH. 227C1 100kW 299 M HAAT

MULLANEY ENGINEERING, INC.  
GAITHERSBURG, MARYLAND  
FIGURE 2  
MAY 1997

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 24-MAY-97 07:40:01 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 970523 \*\*\*\*\*

WPZM	BLH890717KC	227 C1	FM	POLARIZATION	ERP (KW)	HAAT	RCMSL
Tullahoma TN	US		LIC		HOR PLN	BM TILT	(METER)
35.0204	86.2252 (D.MMSS)			HORIZONTAL	100.000	0.000	299.0
Tennessee Valley Radio, Inc.				VERTICAL	100.000	0.000	299.0
							589

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AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG REL CHN	ERP (KW)		HAAT (M)	D I-CON F5010	P-CON F5050	IR DIST (KM)	IC RSEP (KM)	REZLT IR IC
FROM	TO								HORZ	VERT						
184.1	4.1	WCRQFM	LIC	BLH910424KD	Arab	AL A	34.2103	86.2625 3RD 224A	.8H .8V	190			76.0	75.		C
336.4	156.1	WJXA	LIC	BLH861204KB	Nashville TN	A	36.0714	86.5807 2ND 225C	100.B100.B	321			131.7	105.		
158.2	338.5	WGMZ	LIC	BLH931027KA	Glencoe	AL A	33.5716	85.5140 1ST 226A	1.65H1.65V	1890			129.0	133.		S
83.4	264.4	WBINFM	LIC	BLH961010KC	Benton	TN A	35.1115	84.3813 1ST 226A	6.0H 6.0V	-2E			159.9	133.		
145.9	326.8	WVFJFM	LIC	BLH850514KA	Mancheste	GA A	32.5040	84.3725 CO 227C	100.H100.V	381			292.2	270.		
145.1	326.0	WVFJFM	CP	BPH960823IF	Mancheste	GA A	33.0510	84.4610 CO 227C1	27.H 27.V	491			262.4	245.		
238.8	57.4	WSYE	LIC	BLH901017KB	Houston	MS A	33.4506	88.5240 CO 227C	100.H100.V	550			270.1	270.		C
84.8	267.2	WTPT	LIC	BLH871214KB	Forest Ci	NC A	35.1619	82.1400 CO 227C	93.H 93.V	619			378.9	270.		
0.0	0.0	WPZM	LIC	BLH890717KC	Tullahoma TN	A	35.0204	86.2252 CO 227C1	100.H100.V	299			0.0	245.		-
3.1	183.1	WDNS	CP	BPH960402IB	Bowling G	KY A	36.5639	86.1511 CO 227C3	12.0H12.0V	144			212.2	211.		C
0.4	180.4	WDNS	LIC	BMLH951113KE	Bowling G	KY A	37.0245	86.2153 CO 227A	6.H 6.V	91			223.2	200.		
**COMMENT**To change to 227C3 per one-step application BPH-960402IB																
318.8	137.5	WKYQ	LIC	BLH940922KC	Paducah	KY A	37.0256	88.3652 CO 227C1	100.H100.V	279			300.8	245.		
101.2	282.3	WLJAFM	LIC	BLH910405KB	Ellijay	GA A	34.4259	84.3050 1ST 228A	5.2H V	830			174.3	133.		
280.3	99.2	WKWX	LIC	BMLH950612KA	Savannah	TN A	35.1708	88.1003 1ST 228A	6.0H 6.0V	91			165.1	133.		
97.5	278.2	WMPZ	LIC	BLH950105KC	Ringgold	GA A	34.5351	85.1025 2ND 229A	3.0H 3.0V	100			111.3	75.		
258.7	78.2	WFIX	LIC	BLH931220KC	Rogersvil	AL A	34.5152	87.2343 3RD 230A	2.25H2.25V	1620			94.5	75.		

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THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

THE SHORT SPACING WITH WGMZ AT GLENCOE, AL, WAS OBTAINED BY WGMZ UNDER  
 SECTION 73.215 -- CONTOUR PROTECTION.

CHANNEL ALLOCATION STUDY

RADIO STATION WPZM  
 TULLAHOMA, TENNESSEE  
 CH. 227C1 100kW 299 M HAAT

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND

FIGURE 3  
 MAY 1997